

Dear Julie,

My comments on the MWELO June 12, 2015 public draft are below for your consideration.  
Thank you!

**A. I support the proposed requirement for irrigation sub-meters, coupled with periodic confirmation that actual water use is not exceeding the MAWA.** I believe this is perhaps the most significant issue affecting landscape water use/over-use. We can design the best irrigation system using the most efficient technology and it can be audited and approved upon installation to confirm compliance with standards, but when it comes down to it, we have no control over whether the system is being operated properly. We find over-watering to be a common problem in our built projects.

**B. I believe that reducing the precipitation rate to 1"/hr. may not be advisable,** as you may be excluding some well-researched, effective equipment and irrigation techniques from the irrigation designer's kit of parts. My hope is that metering water use will allow the designer flexibility in equipment selection and design, while ensuring conformance with the MAWA for the site.

**In addition;**

There was a public comment during the Los Angeles meeting on 6/16/15 that piqued my interest. Does the current MAWA formula take into consideration the natural climate of the area being irrigated, beyond factoring-in the ET? At the risk of oversimplifying the situation, I believe the example cited stated something like 'why does a Palm Desert landscape get twice that of Mendocino County? It's the desert and should not get so much extra water'... I cannot offer a solution with respect to how this is calculated, but I do wonder if there is a way to account for this regional distinction. And again, I have not completely resolved this scenario in my head, nor confirmed the actual water allowances under current MAWA, but did think this was a provocative question for what it's worth.

Thank you for the opportunity to participate in this conversation,  
Shannon Rogers  
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